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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Department of Public Safety

(209) 667-3114

March 30, 1993

RE: PR Docket 92-235

Ms. Donna Searcy, Secretary
Federal Communications Commission
1919 M Street NW, Room 222
Washington, DC 20554

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FCC MAIL ROOM

Dear Ms. Searcy:

It is my understanding that the Federal Communications Commission is reviewing the *Refarming Docket* that will essentially reassign existing public safety communications frequencies below 470 MHz. I wish to firmly voice my concerns over this measure, and urge that the commission *not proceed in this matter*.

This, legislation, if enacted, will severely impact on those agencies currently using these radio bands, for the following reasons:

- All existing radio equipment, bought with tax dollars, will be rendered useless. It cannot be retrofitted or modified to meet the new frequency requirements. The cost for replacements will be staggering. Most agencies will not be able to adequately budget for these replacements. In an era of budget reductions, and a rising crime rate, this endeavor would not be in the best public interest.
- This rule will result in a reduction of wattage (power) to the individual agencies. In open areas (such as ours), we must rely on communications over large distances. Small agencies are not self-reliant and depend heavily on mutual aid. This interdependence entails common channels that have the ability to reach to outlying county and rural areas. It is also my understanding that our FM radio communications will be degraded further by a reduction of signal to noise ratios.
- The coordination of new systems within jurisdictions will present an administrative "nightmare" and will result in exceptional costs. Additionally, the smaller agencies may not be able to successfully negotiate adequate frequencies to meet local needs. When competing for these limited resources, many times, the frequencies will be allocated to accommodate a larger department with what is perceived as "greater" needs.